



Water Resources Protection Programs, 1212 5th Street 3rd Floor, Santa Monica, CA 90404

Illicit Connection/Illegal Discharges

The City Of Santa Monica Water Resources Protection Programs has implemented a program of identifying illegal connections and illicit disposal practices dating back to 1987.

The program addresses the following:

Illicit Connections

Illicit Connection Investigation

- Since 1987, environmental inspectors have examined drain inlets and sump drains located at individual businesses and have either had them sealed or redirected to the City sewer system. The testing of drainage flow is complete through the use of dyes and visual inspections.
- Illicit connections at residential sites have also been addressed, usually through complaints that have been filed or visual observations by City staff.
- All facilities making corrections to illicit connections must first get approval for new connections from the Building and Safety Department plumbing inspector.
- In the majority of cases, illicit connections are resolved with redirecting discharges to the City sewer system.
- Much time and effort has been spent with the Auto Repair and Auto Dealer businesses in an attempt to eliminate drains used for washing vehicles that are connected to the curb face. These curb outlets discharge to the City street, storm drain, and ultimately into the Santa Monica Bay.
- Restaurant drainage systems have also been a major focus of attention because of mat, equipment, and garbage bin washing activities. Floor mats washing activities outside the facility by a drain directed to the storm drain system have been strictly prohibited.
- Generally, for all businesses, necessary pretreatment equipment has been required to cleanup or divert wastewater flows from the storm drain system to the sewer

system, ie., oil/water separators, grease interceptors, filtration systems, and rainwater diverter valve systems.

- Since the ICID program and enforcement program began in 1987, there have been approximately 50 auto related businesses that have been required to install vehicle-washing facilities with connection to the City sewer system. The average cost of installing a vehicle wash facility with proper pretreatment is between \$10,000 and \$15,000.

We responded to more than 133 incidences of illicit discharges/connections during FY 2005/2006.

The Water Resources Protection Programs(WRPP) has a formalized Enforcement Response Plan that addresses illicit connection and disposal as well as other types of environmental violations. The following procedures are followed:

- Verbal Warning
- Notice of Correction
- Notice of Violation -- Follow-up inspection/sampling
- Consent Order -- Compliance Status Meeting
- Cease and Desist Order
- Compliance Order -- Compliance Status Meeting
- Permit Suspension Order
- Revocation of Permit Order
- Civil/Criminal Case -- Referral to City Attorney's Office
- WRPP personnel participate on the Los Angeles County Environmental Crimes Strike Force Meetings.
- City ordinances such as the Urban Runoff Ordinance and the Industrial Wastewater Control Ordinance give inspectors the enforcement authority to address illegal activities.

Record keeping and Documentation

All investigations of illicit discharge/connections are currently documented and filed by hard copy or electronically. A copy of the electric complaint investigation form is enclosed.

It is obvious that the monitoring of the business community has resulted in a reduction of storm water related discharges. Businesses steam cleaning engines, dumping antifreeze and hosing off debris and oily residue into the storm drain system were common place at the inception of the inspection and monitoring program. Today the streets and alleys are very dry.

Illicit Discharges

Spill Investigation, Containment and Cleanup

- Complaint Investigation/Emergency Response to spills or discharges to the City Street, storm drain system and Santa Monica Bay.
- Containment of the spill or release is the first priority.
- The facility or person committing the violation normally completes cleanup. If the violator is unable to perform the cleanup then City staff may perform the cleanup and bill the violator for cost recovery.
- Follow-up is an integral part to resolving these complaints that will recur if not addressed properly. Coordination exists between the WRPP, Fire Department, Environmental Programs, Wastewater, and the Public Works Department.

Prioritization and Investigation of Illicit Disposal

- On daily basis Environmental Inspectors continually patrol areas where illegal disposal practices occur. Prioritization is given to discharges that have the greatest impact on the storm drain system and Santa Monica Bay.
- Weekly meetings are held with inspectors to discuss current problem areas and any new complaints that have arisen.
- Information is compiled on areas of illicit disposal locations.
- Environmental Inspectors continually educate both the industry and residential violators on the proper implementation of Storm water BMPs. Automotive businesses, specially, benefited from the workshops that the City offered them as training for the "Best Environment Practices".
- Other City personnel who conduct field activities have been educated on illicit discharges and cleanup.
- Sewage overflows in the sanitary system are prevented through the installation and monitoring of sewer related discharges from businesses. The installation of grease interceptors for new restaurants helps to reduce the buildup of grease in the sanitary sewer thereby reducing opportunities for sewer overflows. Industrial Waste staff works with the Wastewater Crews in an attempt identify problem restaurants that cause backups to the City sewer system. These restaurants are targeted for enforcement action and are required to mitigate their grease discharge.

Standardized Enforcement Procedures

The WRPP has a formalized Enforcement Response Plan (see enclosed) that addresses illicit connection and disposal as well as other types of environmental violations.

Procedures are as follows:

- Verbal Warning
- Notice of Correction
- Notice of Violation – Follow-up inspection/sampling
- Consent order – Compliance Status Meeting
- Cease and Desist Order
- Compliance Order – Compliance Status Meeting
- Permit Suspension Order
- Civil/Criminal Case – Referral to City Attorney's Office
- Industrial Waste Section personnel participate on the Los Angeles County Environmental Crimes Strike force Meetings.

- City ordinances such as the Urban Runoff Ordinance and the Industrial Wastewater Control Ordinance give inspectors the enforcement authority to address illegal activities.

- Permitting is a control mechanism used by the WRPP to control the discharge of pollutants from commercial businesses located in the City of Santa Monica.

Industrial/ Commercial Outreach Materials:

Educational material distribution: wash water guidelines, posters, placards, and informational items. These educational materials have been distributed to the business community and businesses not located in the City of Santa Monica but licensed to conduct business operations within the City of Santa Monica i.e., carpet cleaning, pool cleaning companies and steam cleaning companies. In addition we are working presently on generation of educational material aimed towards reduction of oil & grease in our sewer lines and therefore sewer overflow incidences.

Education for City inspectors is ongoing. Environmental inspectors are familiar with the following items:

- Storm Water Regulations Employee Training
 - A Clear Solution
 - Storm Water Pollution Prevention
 - Excal Visual Communications

- Public Employer Training Manual – Municipal Activities, Construction Activities

Public Employee Trainer Manual

Prepared by Larry Walker and Associates with Harris & Company, Rogers & Associates

- California Storm Water Best Management Practice Handbooks
Prepared by Camp Dresser & McKee, Larry Walker Associates
- California Industrial Commercial Inspection Program Handbook for Municipal Agencies, Alameda Countywide Clean Water Program
- CWEA (California Water Environment Association) conferences on water quality
- P2 symposiums and Southern California Pollution Prevention Committee meetings.

WRPP staff have participated as trainers, members of storm water model program subcommittees for LA County, and storm water session chairs for CWEA conferences.

Public Reporting

- Since 1987, storm water related complaints have been channeled to the various departments. All complaints received from the business or residential community has continued to be addressed in a timely manner.
- Public Reporting — The Pollution Prevention Hotline was established to allow residents the opportunity to call in and report illegal discharges into the Santa Monica Bay. The hotline is marketed through various mediums.

Industrial Database

The City Of Santa Monica has identified industries within the City that are subject to the General Industrial Permit for storm water. The City of Santa Monica WRPP has submitted its Industrial Commercial Education Program Database to the County of Los Angeles Public Works Dept./Environmental Programs Division. A copy of the database is available upon request. Enclosed, is a sample of the database information. The WRPP has also submitted database information to UCLA. They were conducting a survey of cities to identify businesses that might be subject to the General Industrial Permit for storm water.

Inspect Automobile Uses and Restaurants

- Since 1987, the City Of Santa Monica WRPP has operated an inspection program that targets both automobile related businesses such as auto repair, auto dealers, auto rentals, auto wash, gas stations, airplane repair, and food related businesses such as restaurants, food markets, bakeries, convalescent hospitals, and hotels.
- The WRPP staff devotes approximately 30% of their time to storm drain related responses, education, inspection, sampling, and enforcement work. In addition, the WRPP staff receives active cooperation and resources from the City of Santa Monica Wastewater Crews, Fire Department, Environmental Programs and the Police Department.
- Currently, there are approximately 200 auto related facilities and 400 food related industries that are inspected on an annual basis. These industries were inspected during the 2005/2006 reporting period and have been inspected on the annual basis since 1987. The inspections involve checking that storm water BMPs are in place and educating the facility representative about urban runoff and Santa Monica Bay pollution. Samples of the Storm water Facility Inspection Report Forms are enclosed.
- The inspection program has required many businesses to implement physical and engineering measures in order that pollutants are not discharged into the storm drain system and Santa Monica Bay. Often this can mean building spill containment structures, rerouting drains to the City sewer system, installing berms, sealing and covering drains, and the installation of oil/water separators.
- Permitting – An integral component of the inspection program involves the permit that the facility receives addresses both sewer and storm drain discharges. Each permit outlines the fact that no wastewater discharges of any kind are permitted to city streets or storm drains. They are also informed about pollution prevention and storm water best management practices. Copies of the auto repair and restaurant inspection forms are enclosed.
- The City Attorney's Office is used in the event that compliance cannot be achieved through verbal or administrative means. The City Attorney's Office is one of the most important elements of this enforcement effort against illegal storm drain discharge.